

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

RAYMOND YEE,)	
)	
Plaintiff,)	Case No. 07 C 7150
)	
v.)	Judge Marovich
)	
UBS O'CONNOR, LLC and)	Magistrate Judge Schenkier
UBS GLOBAL ASSET MANAGEMENT,)	
)	
Defendants.)	

DEFENDANTS' RULE 26(a)(1) INITIAL DISCLOSURES

UBS O'CONNOR, LLC ("O'Connor") and UBS GLOBAL ASSET MANAGEMENT ("GLAM") (collectively the "Defendants"), by and through their attorneys, Neal, Gerber & Eisenberg LLP, state as follows for their initial disclosures:

A. Individuals Likely To Have Discoverable Information

The following individuals are likely to have discoverable information relevant to the disputed facts alleged in the Complaint:

- (1) Raymond Yee
c/o Paul W. Mollica
Meites, Mulder, Mollica & Glink
20 South Clark Street, Suite 1500
Chicago, IL 60603
(312) 263-2942

Yee likely possesses discoverable information regarding the allegations made in the Complaint, including his employment and the events leading up to the end of his employment, and any damages he allegedly suffered.

- (2) Kipp Schrage
Managing Director – Alternative & Quantitative Solutions
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Schrage likely possesses discoverable information regarding the allegations made in the Complaint, including Yee's employment, work performance, and the events leading up to the end of his employment.

- (3) Angela Rudin
Director of Human Resources
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Rudin likely possesses discoverable information regarding the allegations made in the Complaint, including Yee's employment and the events leading up to the end of his employment.

- (4) Dawn Fitzpatrick
Managing Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Fitzpatrick likely possesses discoverable information regarding the allegations made in the Complaint.

- (5) Robert Apter
Executive Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602

(312) 269-8000

Apter likely possesses discoverable information regarding the allegations made in the Complaint.

(6) Molly Carl
Executive Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Carl likely possesses discoverable information regarding the allegations made in the Complaint.

(7) Paul Chambers
Executive Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Chambers likely possesses discoverable information regarding the allegations made in the Complaint.

(8) Paul Mitchell
Managing Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Mitchell likely possesses discoverable information regarding the allegations made in the Complaint.

- (9) Michael Braden
Executive Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Braden likely possesses discoverable information regarding the allegations made in the Complaint.

- (10) Chris Shibutani
Executive Director
c/o David B. Ritter
Neal, Gerber & Eisenberg LLP
2 N. LaSalle Street, Suite 2200
Chicago, IL 60602
(312) 269-8000

Shibutani likely possesses discoverable information regarding the allegations made in the Complaint.

Defendants will supplement this response as necessary in accordance with applicable rules.

B. Description Of Relevant Documents

Defendants produced Yee's personnel file to Plaintiff's counsel in July 2007. Pursuant to the Joint Status Report and Proposed Discovery Plan filed with the Court on April 4, 2008, and the Parties' agreed-upon mutual extension, the Parties will shortly exchange their responses to their respective initial discovery requests. Defendants are presently in the process of gathering the responsive documents – including the responsive documents relating to Yee's employment; other relevant employees; Robert Apter; Yee's internal job search with Defendants; and Defendants' relevant policies – and will provide them to Plaintiff along with their discovery

responses, subject to the Parties' agreement to an appropriate protective order. Defendants will supplement this response as necessary in accordance with applicable rules.

C. Calculation Of Damages

Defendants are not claiming any damages at this time, but may seek their attorneys' fees and costs upon their successful defense of this action. Defendants will supplement this response as necessary in accordance with applicable rules.

D. Insurance Policies

There are no insurance policies applicable to this matter.

Dated: May 14, 2008

Respectfully submitted,

**UBS O'CONNOR, LLC AND
UBS GLOBAL ASSET MANAGEMENT**

By: /s/David B. Ritter
David B. Ritter

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CERTIFICATE OF SERVICE

I, David B. Ritter, an attorney, hereby certify that a true and correct copy of the foregoing Defendants' Rule 26(a)(1) Initial Disclosures was filed electronically. Notice of this filing will be sent to the following party by operation of the Court's electronic filing system:

Paul W. Mollica
Karen Sheley
Meites, Mulder, Mollica & Glink
20 South Clark Street, Suite 1500
Chicago, IL 60603

Parties may access this filing through the Court's ECF system.

/s/ David B. Ritter
David B. Ritter

NGEDOCs: 1531449.2